

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMANUEL JONES

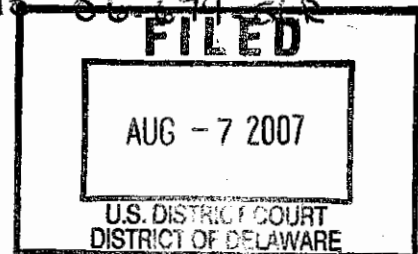
Plaintiff

v.

OFFICER NORRIS and NEW CASTLE  
COUNTY POLICE DEPARTMENT,  
Defendants,

C.A. No. 06-674-SLR

06-674 (SLR)



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PLAINTIFF'S SECOND REQUEST FOR PRODUCTION  
DIRECTED TO DEFENDANTS

Pursuant to the Federal Rules of Civil Procedure, Plaintiff hereby request that the defendant produce the following documents of recorded information included but not limited to writings, drawing, graphs, charts, photographs, audio-recordings, tapes, computer printouts, and other data compilations from which data or information can be obtained and translated, if necessary, into reasonably useable form.

If any document required to be produced by this request is claimed by you to be not discoverable because it is privileged or for any other reason, then each such document should be identified in your response by date, sender, recipient, persons to whom copies have been furnished, and subject matter, and the basis for the claim of privilege or other reason should be stated in your response.

Please produce the following:

1. New Castle County Police Departmental Policies on the use of Force only when necessary to affect a lawful objective, according to 11 Del C § 467.

2. Copies of Injury reports

3. Incident report, policies on the use of Force with a stun device, policies and the instruction pertinent to those policies (C.A.L.E.A. standards 1.3.1 through 1.3.5).

4. All written recorded statements, description of statements, summaries of statements, memoranda (signed or unsigned), of any witness or any party identified herein, during the criminal charges, including tapes or other mechanically transcribed information.

5. Any and all documents containing the names and home addresses of all individuals contacted as potential witnesses.

6. Directive on Stun devices to assist in making a lawful arrest when resistance is encountered.

7. All photographs, recordings, films, charts, sketches, graphs and diagrams taken and/or prepared,

8. All writings, memoranda, data and/or tangible things which relate directly or indirectly to the incident and writings set forth to review by the Professional Standards Unit.

9. All photographs, diagrams, drawings, reports, statements, and each and every item given to or examined by experts or consultants.

Emanuel H. Jones #557338  
Plummer Community Corrections  
38 Todd's Lane  
Wilmington, DE 19802-3210

DATED: 08/04/07

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FOR THE DISTRICT OF DELAWARE

EMANUEL JONES

Plaintiff

v.

C. A. No. 06-674 SLR

OFFICER NORRIS and NEW CASTLE

COUNTY POLICE DEPARTMENT,  
Defendants.

CERTIFICATE OF SERVICE

I, Emanuel Jones, Plaintiff hereby certify that on  
the      day of July 2007, two copies of the Plaintiffs'  
Second Request for Discovery were served by U.S. Mail  
to the following:

NEW CASTLE COUNTY OFFICE OF LAW  
Julie M. Sebring Esq. - DE ID #2259  
Assistant County Attorney  
87 Read's Way  
New Castle, DE 19720  
Attorney for Defendant New  
Castle County Police Department

OFFICE OF the Clerk  
United States District Court  
844 W. King St Lock Box 18  
Wilmington, Delaware 19801  
3370

DATED 08/07/07